

DAYLE ELIESON
United States Attorney
District of Nevada
TINA NAICKER, CSBN 252766
Special Assistant United States Attorney
160 Spear Street, Suite 800
San Francisco, California 94105
Telephone: (415) 268-5611
Facsimile: (415) 744-0134
E-Mail: Tina.Naicker@SSA.gov

Attorneys for Defendant

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

PATRICK CANNON,

Plaintiff,

v.

NANCY A. BERRYHILL,
Acting Commissioner of Social Security,

Defendant.

Case No. 2:18-cv-00470-KJD-CWH

**JOINT STIPULATION FOR EXTENSION OF
TIME AND [PROPOSED ORDER]**

(FIRST REQUEST)

IT IS HEREBY STIPULATED, by the parties, through their respective counsel of record, that the time for responding to Plaintiff's Motion for Remand be extended from November 8, 2018 to **December 8, 2018**. This is Defendant's first request for extension. Good cause exists to grant Defendant's request for extension. Counsel was out of the office for nearly three weeks on intermittent sick leave for the flu/acute pneumonia. Counsel also had a migraine for the last two days which impairs her vision. Counsel also has over 75+ active matters, which requires two or more dispositive motions a week until late-December. In addition, Counsel has active civil rights and representative misconduct matters that require immediate investigation. Counsel also has a Ninth

1 Circuit brief due in mid-November, which requires multiple levels of review. Due to Counsel's
2 unexpected leave and heavy workload, Counsel needs additional time to adequately review the
3 transcript and properly respond to Plaintiff's Motion for Remand. Defendant makes this request in
4 good faith with no intention to unduly delay the proceedings. The parties further stipulate that the
5 Court's Scheduling Order shall be modified accordingly.
6

7 Respectfully submitted,

8 Dated: November 7, 2018

/s/ *Cyrus Safa
(*as authorized by email on November 6, 2018)
CYRUS SAFA
Attorney for Plaintiff

11
12 Dated: November 7, 2018

DAYLE ELIESON
United States Attorney
DEBORAH LEE STACHEL
Regional Chief Counsel, Region IX
Social Security Administration

15
16 By /s/ Tina L. Naicker
TINA L. NAICKER
Special Assistant U.S. Attorney
Attorneys for Defendant

19 **ORDER**

20 APPROVED AND SO ORDERED:
21

22
23 DATED: November 13, 2018


HON. CARL V. HOFFMAN
UNITED STATES MAGISTRATE JUDGE

1 **CERTIFICATE OF SERVICE**

2 I, TINA L. NAICKER, certify that the following individual was served with a copy of the
3 **JOINT STIPULATION FOR EXTENSION OF TIME AND [PROPOSED ORDER]** on the date
4 and via the method of service identified below:

5 **CM/ECF:**

6 Cyrus Safa
7 Law Offices of Lawrence D. Rohlfing
8 12631 E. Imperial Highway, Suite C-115
9 Santa Fe Springs, CA 90670
10 562-868-5886
11 Fax: 562-868-5491
12 Email: cyrus.safa@rohlflinglaw.com

13 Attorneys for Plaintiff

14 Respectfully submitted this 7th day of November 2018,

15 /s/ Tina L. Naicker
16 TINA L. NAICKER
17 Special Assistant United States Attorney
18
19
20
21
22
23
24
25
26